

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

**EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

Plaintiff,

and

TRACY FRYE and CINDY FRYE,

Plaintiffs-Intervenors,

v.

NEW APPLE, INC.,

Defendant.

**CIVIL ACTION NO.
4:17-cv-01150-AMQ-KDW**

**JOINT MOTION FOR ENTRY OF
CONSENT DECREE**

Plaintiff U.S. Equal Employment Opportunity Commission, Plaintiff-Intervenor Tracy Frye, Plaintiff-Intervenor Cindy Frye, and Defendant New Apple, Inc. respectfully move this Court to enter the attached Consent Decree.

Respectfully submitted this the 17th day of July, 2018.

WE SO MOVE:

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION**

s/ Rachael S. Steenbergh-Tideswell

RACHAEL S. STEENBERGH-TIDESWELL

South Carolina Federal Bar No. 10867

Senior Trial Attorney

**EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION**

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WITH CONSENT OF:

**TRACY FRYE and CINDY FRYE,
Plaintiffs-Intervenors**

s/Leon Martin Ortner

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and

ATTORNEYS FOR PLAINTIFF

**NEW APPLE, INC.,
Defendant**

s/ Amanda Pickens Nitto

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